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CAMPUS COMMONS PARK CORPORATION

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EDWIN L. HULLANDER

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION**

EDWIN L. HULLANDER,

Plaintiff,

v.

CAMPUS COMMONS PARK  
CORPORATION,

Defendant.

CASE NO. 2:22-cv-01843-CKD

**STIPULATION TO EXTEND TIME FOR  
DEFENDANT TO RESPOND TO  
PLAINTIFF'S COMPLAINT; ORDER**

TO THE CLERK OF COURT:

Plaintiff EDWIN L. HULLANDER ("Plaintiff") and Defendant CAMPUS COMMONS PARK CORPORATION ("Defendant"), by and through their counsel, do hereby stipulate and agree as follows:

**STIPULATION**

1. Plaintiff filed this action on October 17, 2022 and served the Defendant with process on November 1, 2022.

2. Through its corporate counsel, Defendant received previous extensions to and including December 30, 2022, for Defendant to respond to Plaintiff's Complaint;

3. On December 20, 2022, O'Toole Rogers, LLP ("Counsel") was appointed by Defendant's insurance carrier to represent Defendant in the above-entitled action;

4. Given the intervening holidays, Counsel's prearranged travel, and to allow Counsel adequate time to prepare a response to the Complaint, the parties STIPULATE and AGREE that good cause exists for Defendant to have a further extension of time up to and including January 6, 2023, to file a responsive pleading to Plaintiff's Complaint; and

5. This document is being electronically filed through the Court's ECF System. In this regard, counsel for Defendant hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Plaintiff's counsel has concurred with the filing of this document; and (3) a record supporting this concurrence is available for inspection or production if so ordered.

Respectfully submitted,

**O'TOOLE ROGERS, LLP**

Date: December 21, 2022

By: /s/ Nicholas A. Rogers  
NICHOLAS A. ROGERS  
AARON A. HAYES  
Attorneys for Defendant  
CAMPUS COMMONS PARK CORPORATION

**ALLACCESS LAW GROUP**


Date: December 21, 2022

By: /s/ Irakli Karbelashvili (as authorized on December 20, 2022)  
IRENE KARBELASHVILI  
IRAKLI KARBELASHVILI  
Attorneys for Plaintiff  
EDWIN L. HULLANDER

**ORDER**

Pursuant to the parties' stipulation, **IT IS SO ORDERED** that Defendant shall have an extension of time to and including January 6, 2023, to respond to Plaintiff's Complaint.

Dated: December 28, 2022

  
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CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE